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Complaint

United States District Court for the
Eastern District of Wisconsin

Plaintiff: Victor Robert Brown

V.

Defendant(s): 3rd shift Nurse Jane Doe,
1st shift Nurse Jane/John Doe, Sue Peter
Sean Lutsey; in their individual capacity

Case Number _____

A Parties:

1) Plaintiff is a citizen of Wisconsin and
is located at the Green Bay Corr.
Inst., PO Box 19033/2833 Riverside Dr.
Green Bay, WI 54307-9033

2) Defendant(s) 3rd shift Nurse Jane
Doe; 1st shift Nurse Jane/John Doe, Sue
Peters; Sean Lutsey

Was working ~~at~~ for the Green Bay
Corr. Inst. on the date stated in my
claim. Or were involved somehow in
my Complaint.

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B) Jurisdiction - I am suing for a Violation of Federal Law 28 USC § 1331

C) I am unsure of whether I want a jury to hear my case. At this time I will say that I do Not want a jury.

D) The following is a statement of my claim:

1) on or about 2/8/17 on 3rd shift I, plaintiff Victor Robert Brown was housed in the Restrictive Housing Unit at GBCI.

2) on or about 2/8/17 on 3rd shift Nurse Jane Doe was ^{the} assigned RN.

3) on or about 2/8/17 on 3rd shift somewhere between 10 - 11:59 pm. I cut myself and bled all over the floor. There was a lot of blood.

4) on or about 2/8/17 before Midnight a CO noticed me or I told the CO. I cut myself.

5) immediately I was brought out to H. to be seen.

6) I needed a wheel chair for escort.

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7) At Hsu I was assessed by the 3rd shift nurse Jane Doe.

8) She claimed my vitals were "stable" by the blood pressure machine and other instruments.

9) She also viewed the amount of blood that was on my floor

10) She also had access to my file where recent incidents similar to this happened.

11) I believe staff followed policy and procedure and took pictures of the blood on the floor.

12) I was placed into obs placement.

13) on 2/9/17 on 1st shift I was ~~ass~~ assessed by a different RN Jane/John Doe and was deemed "stable" based off my vitals information.

14) on 2/9/17 @ approx 7, 8 or 9pm I notified staff who intern notified Hsu RN Shane about me having chest pains and feeling very weak.

15) at approx 11pm that same night I continued to have serious chest pains.

16) as a result RN Shane ordered that I be sent to the ER - emergency room at St. Vincents hospital

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- 17) Once at St. Vincents hospital Emergency Room, on or about 2/9/17 - 2/10/18, I was assessed.
- 18) It was determined that due to my blood loss the previous day (2/8/17 3rd shift) that I needed 3 units of blood for a transfusion.
- 19) For proof I followed the requirements for the P.H.A. see GBCI Complaint # GBCI-2017-4935

E) the relief I am seeking as a preliminary estimation is as follows:

1) Monetary Damages:

a) Actual Damages:

- Out of Pocket expenses - Unknown at this time
- Physical & Mental Suffering - \$7.5 Million.

b) Nominal Damages: Unknown at this time.

c) Punitive Damages - \$7.5 Million.

2) Injunctive Relief: a) Plastic surgery consult for scars.

b) Skin graft surgery consult for scars.

(E) Relief (2) Injunctive Relief - continued

c) Nurses receive more training in dealing with self inflicted injuries and treatment for self-inflicted injuries

d) Doc/GBCI Doctors and Nurse practitioners receive more training in dealing with self-inflicted injuries and treatment for self-inflicted injuries.

3) Preliminary Injunction: Reasons I would like the court to consider granting my preliminary Injunction request(s) are

a) Currently GBCI has NO 3rd shift RN or even an LPN.

b) Even in Emergencies GBCI officials only call the on call nurse and tell them what happened. The nurse has no professional insight to the issue(s) so can make an appropriate decision for the care a prisoner-patient might need.

c) the only time a nurse is here on 3rd shift is when ~~some~~ a prisoner is in restraints.

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(E) Relief (3) ~~request~~ Preliminary Injunction continued.

3) Preliminary Injunction Request(s):

a) GBCI hire a 3rd shift nurse
1 (or) 1

b) GBCI have a on-call nurse that will come in for any prisoner-patient who self harms significantly (I.E. deep cuts, blood loss, any amount of over-dose, hanging, foreign body insertion, etc.) and certian medical issues such as (chest pains) on 3rd shift which is timed for 10pm through 5am

I declare under penalty of Perjury that the fore going is true and correct to the best of my knowledge.

Complaint signed on the 7th day of December 2018

Sincerely True and forever
in Truth

Victor V. Brown

Victor Brown 529809

PO Box 19033 / GBCI

Green Bay WI 54307